

EXHIBIT 8

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

9 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF TOM KELLY
REGARDING WILLIAM B. ABRAMS
MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- 10 ☐ Affects PG&E Corporation
11 ☐ Affects Pacific Gas and Electric Company
12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,
14 No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

15 **DECLARATION OF TOM KELLY**

16 Tom Kelly declares the following pursuant to 28 U.S.C. § 1746:

17 1. I am the owner of KELLY GRAPHICS, a company based in Austin, Texas,
18 principally focused on mail delivery and social media assessment.

19 2. I sent all the mail from WATTS GUERRA to its California Fire clients regarding
20 the pending vote of the PG&E Reorganization Plan..

21 3. I sent no mail to any individual not previously retained by WATTS GUERRA.

22 4. I have sent the Disclosure Statement and other court-ordered materials to WATTS
23 GUERRA's clients, as well as periodic update letters.

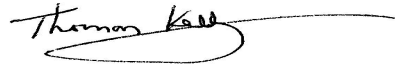
24 5. In addition, as to clients indicating to WATTS GUERRA that they preferred to
25 communicate in Spanish, WATTS GUERRA received from counsel for the Debtor, the court
26 certified Spanish translations of (1) the Disclosure Statement, (2) the Amended Disclosure
27
28

1 Statement, (3) Order Approving Disclosure Statement, signed by Judge Montali on March 17,
2 2020; (4) Fire Victim Claim statement; and (5) the Individual Fire-Victim Ballot, and I have
3 mailed the Spanish language version of those documents to those Spanish-language WATTS
4 GUERRA clients.

5
6 6. I affirm that the facts set forth in this declaration are true and correct.

7 Dated May 8, 2020

Respectfully submitted,

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9 

10
11 _____
Tom Kelly